

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

JEREMY PRATT,)
ROBERT J. RUFFNER,)
JOHN TEBBETTS,)
STEVEN BELLEAU, and)
MATTHEW PERRY) Civil Action No.
on their own behalf and) 1:20-cv-00295-JDL
on behalf of all others similarly)
situated,)
Plaintiffs,)
v.)
SECURUS TECHNOLOGIES, INC.,)
Defendant.

**AFFIDAVIT OF CRAIG CLOSSEY IN SUPPORT OF SECURUS
TECHNOLOGIES LLC'S OPPOSITION TO PLAINTIFFS' MOTIONS FOR A
PRELIMINARY INJUNCTION AND EXPEDITED DISCOVERY**

I, Craig Clossey, declare:

1. I present this affidavit in support of Securus Technologies LLC's ("Securus") Opposition to Plaintiffs' Motion for Preliminary Injunction and Plaintiffs' Motion for Expedited Discovery. I am over 18 years old. I have first-hand, personal knowledge of the facts stated herein and, if called to testify, could and would competently testify to those facts.

2. I presently serve as the Aroostook County Jail Administrator, and I also

am a Commander with the Aroostook County Sheriff's Office. I have been employed as the Aroostook County Jail Administrator for approximately 7 years, and in this capacity have personal knowledge of Aroostook County Jail's various operating policies and procedures, including all procedures concerning inmate telephone calls.

3. As part of the Aroostook County Jail's standard intake process for new inmates, the jail's Corrections Staff explains various policies to the inmates, including the protocols for utilizing the jail's phones. Inmates are requested to give the Corrections Staff the name and telephone number of their attorney during the classifications process so calls to their attorney are identified as private and not subject to monitoring or recording. Calls placed by inmates to phone numbers on the private call list are not recorded or monitored. Unless and until the inmate provides the name and phone number of his attorney to the Corrections Staff, the Corrections Staff has no way of knowing the inmate's attorney's telephone number.

4. After receiving the inmate's designated attorney's name and phone number, the Corrections Staff then provides the attorney phone number to the jail's inmate telephone service provider, Securus, or alternatively the Corrections Staff sets the number to private themselves through the jail's user account on the Securus system. Securus then ceases recording or monitoring any calls to the designated attorney phone number from the Aroostook County Jail.

5. The Aroostook County Jail's policy to monitor and record all inmate phone calls, except for attorney calls, also is set forth in the Aroostook County Jail Inmate Handbook at page 9, which states "[a]ll calls except to attorneys will be

monitored and recorded.” Attached hereto as **Exhibit A** is a true and correct copy of the Aroostook County Jail Inmate Handbook, updated May 2019. (“Handbook”).

6. Plaintiff Steven Belleau (“Belleau”) was previously processed into the Aroostook County Jail on or about May 20, 2019. As a new inmate, Mr. Belleau would have received the standard briefing on various jail policies, including how to use the phones. During Mr. Belleau’s intake process at the Aroostook County Jail on or about May 20, 2019, the Corrections Staff issued him a copy of the Handbook. Attached hereto as **Exhibit B** is a true and correct copy of Mr. Belleau’s property inventory, which reflects that he received the Handbook and bears his signature on the second page.

7. In addition to the standard briefing and the Handbook, all inmates are notified of the jail’s policy to monitor and record phone calls through signs posted immediately adjacent to all of the phones at the facility which state, “ALL PHONE CALLS ARE SUBJECT TO MONITORING AND/OR RECORDING.” Attached hereto as **Exhibit C** are true and correct photographs of the signs posted near the phones at the Aroostook County Jail.

I declare under penalty of perjury under the laws of the State of Maine and the United States of America that the foregoing is true and correct.

Executed on December 28, 2020 in Bangor, Maine.

Houlton, Maine


CRAIG CLOSSEY

State of Maine, County of Aroostook, ss.

On this the 27 day of December, 2020,

Personally appeared Craig Closser

Subscribed to the within instrument and acknowledged that
he/she executed the same for the purposed therein
contained.

In witness whereof, I hereunto set my hand and official seal.



My commission Expires
Sept. 26, 2024

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2020, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will cause an electronic notice to be sent to all registered counsel of record.

Dated: December 28, 2020

/s/ Jason J. Theobald _____

Counsel for Defendant
Securus Technologies, LLC,
f/k/a Securus Technologies, Inc.